

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
(Cleveland)**

Sophia Parker Studios, Inc.,  
trading as WIFE NYC,

Plaintiff,

v.

Alice Temperley MBE, TMLL Ltd. (trading  
as Temperley London), Temperley Holdings  
Ltd. (t/a Temperley Holdings), Romo Ltd. (t/a  
ROMO and/or Romo Group), Romo  
(Holdings) Ltd., Romo, Inc. (t/a ROMO  
Fabrics and Wallcoverings and ROMO USA,  
and Does 1-20, Inclusive,

Defendants.

Case No. 1:24-cv-02086-PAB

Judge Pamela A. Barker

Magistrate Judge Reuben J. Shepherd

**DECLARATION OF ALICE TEMPERLEY, MBE**

I, Alice Temperley MBE, declare the following:

1. I am familiar with the facts state herein, and if called to testify, would competently testify thereto.
2. I am a citizen of the United Kingdom, residing in London, England.
3. I am not a citizen of the United States and have never resided in the United States.
4. I have never owned and do not currently own any property, assets, bank accounts, personal or business interests, contractual obligations, residential properties, or commercial properties in the United States. I also do not have any leases or offices anywhere in the United States.
5. I have never been to the State of Ohio.

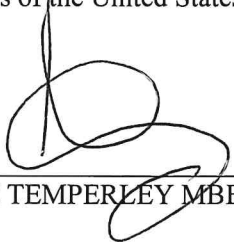
6. I am not licensed to drive in any United States territory and have not registered any vehicles in my name under their laws.
7. I do not have a United States postal address nor any address of any kind in the United States.
8. For the purpose of speaking at a design school, I travelled to the United States about 20 years ago, to speak with students of the Parsons Design School in New York.
9. I am the founder and creative director of Temperley London, a fashion brand based in the United Kingdom.
10. Generally speaking, the typical Temperley London customer would reside in a large cosmopolitan city, such as London, UK.
11. The Temperley London brand was restructured in 2023 and bought by Times Square Group.
12. Since the restructuring, I have remained the creative director and face of the Temperley London brand and manage the brand's design team.
13. As creative director, I work with Temperley London's design team to establish an overall theme and aesthetic for each collection. My involvement begins at the initial concept stage and ends at the collection's final photo shoot.
14. In the typical Temperley London design process, which would have been followed for the collections at issue in this case, the design team hand draws and paints designs to serve as inspirations for a collection's aesthetic. The painted designs are then hand sewn and embroidered into articles of clothing.

15. In addition to my role as creative director, design consultant, and founder of the brand, I promote Temperley London's products by posting on my personal social media pages, directing my friends and followers to view Temperley London collections.
16. I promote Temperley London's products at my own discretion; no individuals, policies, or contractual obligations at or with Temperley London direct or influence my posts in any way.
17. I have no access or control over any Temperley London (or Romo) websites or social media pages.
18. I first learned of Sophia Parker when Ms. Parker sent a cease-and-desist letter to Temperley London and launched a lawsuit against me. Prior to these events, I never heard of or saw Ms. Parker, her work, her website(s), or her social media page(s). I have never heard of the @wifenyc Instagram account until this lawsuit.
19. The collections at issue were launched with multiple promotional events in London, England in early March 2022.
20. After the events in London, I traveled to certain cities in the United States on a promotional tour of the collections. The locations and dates for that tour were as follows:
  - Los Angeles, California; March 23, 2022
  - Orange County, California; March 24, 2022
  - New York City, New York; March 27, 2022
  - New York City, New York; March 28, 2022
21. Temperley London does not have any stores of its own in the United States, and the only boutiques or retail partners in the United States that carry Temperley London products are located in and around the following cities or regions:

- Palm Beach, Florida
- Dallas, Texas
- Houston, Texas
- New York City, New York
- Orange County, California

I declare under penalty of perjury under the laws of the United States that the foregoing is true and accurate to the best of my knowledge.

Dated: May 23<sup>rd</sup>, 2025



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ALICE TEMPERLEY MBE